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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ROBIN BAIN,

Plaintiff.

VS.

FILM INDEPENDENT, INC., *et al.*,

### Defendants.

Case No.: 2:18-cv-04126-PA(JEMx)

### *Hon. Percy Anderson Presiding*

**SUPPLEMENTAL DECLARATION  
OF ROBIN BAIN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT JESSICA HAID'S  
MOTION TO COMPEL  
ARBITRATION**

Date: October 15, 2018

Time: 10:00 a.m.

Courtroom: 9A 1st Street Courthouse

## **DECLARATION OF ROBIN BAIN**

I, Robin Bain, declare as follows:

I am above eighteen (18) years of age and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge. I make this supplemental declaration in support of Plaintiff's Opposition to Defendant Jessica Haid's Motion to Compel Arbitration. If called as a witness I could and would competently testify as set forth below.

1. After I was contacted by a potential film investor and pursuant to advise of counsel, I created the Nowhereland Movie, LLC in October of 2014 for the production of the film *Nowhereland / Girl Lost* (the “Film”). Nowhereland Movie, LLC (“Nowhereland ”) was capitalized at its inception, and maintained bank accounts separate and apart from my own personal accounts.

2. All cast and crew on the Film were paid for their work on the production by Nowhereland. A true and correct copy of the deposit scan of the check issued by Nowhereland to Jessica Cesaro, also known as Jessica Haid, for her role in the Film is attached hereto as Exhibit 5.

3. When production of the Film began on November 3, 2014, and Haid executed the Actor Deal Memo (“November Deal Memo”) with Nowhereland, Haid, like all other members of the Film’s cast, signed two copies of that agreement. I kept one copy of the agreement, and immediately gave the other copy to Haid.

I declare under the penalty of perjury and the laws of the United States of America that the above is true and correct.

Executed on October 3, 2018 in Los Angeles, California.

Robin Bain  
Declarant